

FCC
Order
Ref. 90-
571

FCC Requirement

Sprint's Commitment

	<p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p>Sprint regularly provides 711 dialing information in its education and outreach programs.</p>
<p>§ 64.604 C.4</p>	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	<p>Sprint TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p>
<p>§ 64.604 C.5</p>	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost</p>	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>recovery mechanism</p> <p>(iii) Telecommunications Relay Services Fund - To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p>
<p>§ 64.604 C.6</p>	<p>Complaints</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>The Sprint TRS Customer Contact process is fully compliant with all FCC Requirements.</p>
<p>§ 64.604 C.7</p>	<p>Treatment of TRS Customer Info</p> <p>Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data</p>	<p>Sprint transfers TRS customer profile data to incoming TRS vendors. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or</p>

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must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.

revealed in any other way by Sprint, or Sprint employees.

§ 64.605

State Certification

Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.

Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.

Availability
of SS7
Technology
to TRS
Facilities

Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (§16)

Sprint's SS7 platform supports Caller ID services.

Transmittal
of Calling
Party

Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (§22)

Sprint complies with all FCC rules pertaining to Caller ID and call blocking services.

Sprint's SS7 platform transmits

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Information

Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (§25)

the 10-digit number for local and toll calls. Sprint's SS7 platform also will recognize the ID blocking indicators.

Types of Calls

Concluded that the following call types are adopted as mandatory minimum standards of TRS.

Sprint has provided the VCO and HCO calling combinations since 1996.

Two Line VCO

Two Line HCO

HCO-to-TTY

HCO-to-HCO

VCO-to-TTY

VCO-to-VCO

This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)

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Handling of
Emergency
Calls

Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (¶42)

This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)

Sprint immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.

Answering
Machine
Message
Retrieval

This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.

Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03. (¶62)

Sprint has provided the Answering Machine Retrieval since 1996.

Call Release

Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation.

Ruled that once the CA signs off, or be "released," after the two

Sprint has provided the Call Release feature since 2003.

Once a call is "released" from the CA workstation, the call is no longer a relay call and

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	<p>TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." (§68)</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>accordingly will not be charged to the state customer.</p>
<p>Speed Dialing</p>	<p>Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (§76)</p>	<p>Sprint has provided Speed Dialing or Frequent Dialed Numbers feature since September 1, 1996.</p>
<p>Three-way Calling</p>	<p>Three-way calling feature is generally arranged in one of two ways. (§73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties</p> <p>or;</p> <p>2. The second way is to set up a</p>	<p>Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.</p>

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	<p>three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>This requirement is waived for Internet Relay and Video Relay Services. (176)</p>	



Appendix K

FCC CapTel Mandatory Minimum Standards and Compliance Matrix

FCC CapTel Mandatory Minimum Standards & Compliance Matrix

		FCC CapTel	
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.603	Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers. Speech-to-speech relay service shall be provided by March 1, 2001. Interstate Spanish language relay service shall be provided by March 1, 2001.	The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they	Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first -ever in the TRS Industry. Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3. Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1,

FCC CapTel		
FCC Requirement	Declaratory Ruling (FCC 03-190)	Sprint's Commitment
In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.	allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS. (17)	2004. Sprint is able to process inbound 711 calls to include access to CapTel services.

FCC CapTel			
FCC Requirement	Declaratory Ruling (FCC 03-190)		Sprint's Commitment
Operational Standards			
§ 64.604 A.1	Communications Assistant (CA) Competency Skills	Requirement applies.	Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.
	CAS are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.	Use of CapTel's voice recognition software "is a permissible means for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).	All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.
	CAS must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.	Waived. Interpreting typed ASL is not applicable.	A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL
		Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for enhancing	CapTel's voice

FCC CapTel			
FCC Requirement	Declaratory Ruling (FCC 03-190)	Sprint's Commitment	
<p>Typing Speed > 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>transmission speed." (§39)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p>	<p>recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all CapTel CAs</p>	
<p>§ 64.604 A.2</p> <p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content.</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>	

FCC CapTel		FCC Requirement		FCC Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 A.3	Types of Calls				
	CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.	Waived for outbound calls (§ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (§46)	CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.		
	TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.	Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (§46). Requirement applies. Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound	CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call. CapTel is capable of handling all call types normally provided by common carriers.		

FCC Order Ref. 90- 571		FCC Requirement	Sprint's Commitment
		STS CAs - 15 minutes.	minimum of 15 minutes.
§ 64.604 A.6	CA Gender Preferences	<p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	<p>Sprint users are able to request the gender of the CA. Sprint makes every effort to satisfy this request and to maintain the same gender during transfers.</p>
§ 64.604 A.7	STS Called Numbers	<p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>	<p>Sprint offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user.</p> <p>Sprint will provide the STS user information to any new provider.</p>
Technical Standards			
§ 64.604 B.1	ASCII & Baudot	<p>TRS shall be capable of communicating with ASCII & Baudot</p>	<p>Sprint TRS communicates with Baudot and ASCII in all speeds</p>

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	<p>format at any speed generally in use.</p>	<p>that are generally in use.</p> <p>The following Baudot codes are available on Sprint TRS' platform: Baudot 45.5, Baudot 50, Turbo Code, and E Turbo Code.</p>
<p>§ 64.604 B.2</p>	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Sprint ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Speed of Answer is measured on a daily basis.</p> <p>Sprint's system is designed to the P.01 standards.</p>
<p>§ 64.604 B.3</p>	<p>Equal Access to IXCs</p>	

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Sprint's Commitment

TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.

Sprint provides users with access to their IXC carrier through the Sprint Carrier of Choice program allowing for the same access that is provided to voice users.

§ 64.604
B.4

TRS Facilities

TRS shall operate everyday, 24 hours a day.

Sprint TRS is available 24 hours a day, everyday.

TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Sprint has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.

Adequate network facilities shall be used in conjunction with TRS.

Sprint's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
§ 64.604 B.5	<p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>Sprint is the nation's leader in the development and offering of technological features for TRS. Sprint has introduced over fifty key product enhancements including Split Screen ASCII, Customer Database, Turbo Code, E Turbo Code/Dial Through, Gated VCO, Voice call progression.</p> <p>Sprint provides VCO and HCO technology as standard features as well as several variations on these technologies.</p>
§ 64.604 B.6	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p> <p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for</p>	<p>CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.</p> <p>Sprint does not charge for any additional calls necessary to</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
	<p>additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	<p>complete call involving recorded or interactive menus.</p> <p>Sprint was the first provider to process pay-per-calls (Texas, 1996).</p>

Functional Standards

§ 64.604 C.1	Consumer Complaint Logs	
	<p>States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p>	<p>Sprint maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p> <p>Sprint has submitted annual summary of Consumer Complaints log report:</p>

FCC Order Ref. 90- 571	FCC Requirement	Sprint's Commitment
		<p>June 1, 2002-May 31, 2003</p> <p>June 1, 2003-May 31, 2004</p> <p>June 1, 2004-May 31, 2005</p> <p>June 1, 2005-May 31, 2006</p> <p>June 1, 2006-May 31, 2007</p>
§ 64.604 C.2	Contact Persons	<p>Sprint provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p>
§ 64.604 C.3	Public Access to Info	<p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.</p>

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
		<p>711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	
§ 64.604 A.4	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.</p>

FCC CapTel			
FCC Requirement	Declaratory Ruling (FCC 03-190)	Sprint's Commitment	
<p>§ 64.604 A.5</p> <p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	Requirement applies.	CapTel CAs stay on all calls for a minimum of 10 minutes.	
<p>§ 64.604 A.6</p> <p>CA Gender Preferences</p> <p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	Waived. (§ 36, 47-48).		
<p>§ 64.604 A.7</p> <p>STS Called Numbers</p> <p>STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the</p>	Waived. (§29)		

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
	<p>STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.</p> <p>This information must be transferred to any new provider.</p>		
Technical Standards			
§ 64.604 E.1	<p>ASCII & Baudot</p> <p>TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.</p>	Waived. (¶53-54)	

FCC CapTel			
FCC Requirement		Declaratory Ruling (FCC 03-190)	Sprint's Commitment
§ 64.604 B.2	<p>Speed of Answer</p> <p>TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.</p> <p>Abandoned calls shall be included in the speed-of-answer calculation.</p> <p>Speed of Answer is to be measured on a daily basis.</p> <p>The system shall be designed to a P.01 standard.</p>	<p>Requirement applies</p> <p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.</p>

FCC CapTel Declaratory Ruling (FCC 03-190)			
FCC Requirement			Sprint's Commitment
<p>§ 64.604 B.3</p> <p>Equal Access to IXCs</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>		Requirement applies.	<p>CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.</p>

FCC CapTel		Sprint's Commitment
FCC Requirement	Declaratory Ruling (FCC 03-190)	
8 64.604 B.4	TRS Facilities	
TRS shall operate everyday, 24 hours a day.	FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)	Sprint CapTel is available 24 hours a day, everyday.
TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.		Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.
Adequate network facilities shall be used in conjunction with TRS.	State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).	Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.